EXHIBIT B

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION

MISSISSIPPI STATE CONFERENCE OF THE NATIONAL ASSOCIATION FOR THE ADVANCEMENT OF COLORED PEOPLE; DR. ANDREA WESLEY; DR. JOSEPH WESLEY; ROBERT EVANS; GARY FREDERICKS; PAMELA HAMNER; BARBARA FINN; OTHO BARNES; SHIRLINDA ROBERTSON; SANDRA SMITH; DEBORAH HULITT; RODESTA TUMBLIN; DR. KIA JONES; MARCELEAN ARRINGTON; VICTORIA ROBERTSON,

Plaintiffs,

vs.

STATE BOARD OF ELECTION COMMISSIONERS; TATE REEVES, *in his official capacity as Governor of Mississippi*; LYNN FITCH, *in her official capacity as Attorney General of Mississippi*; MICHAEL WATSON, *in his official capacity as Secretary of State of Mississippi*,

Defendants,

AND

MISSISSIPPI REPUBLICAN EXECUTIVE COMMITTEE,

Intervenor-Defendant.

CIVIL ACTION NO.
3:22-cv-734-DPJ-HSO-LHS

REPORT OF DR. LISA HANDLEY ON THE SBEC PLAN

I have been asked to review the state senate plan drawn by the State Board of Election Commissioners ("SBEC Senate Plan"). I have conducted a district-specific, functional analysis of the two majority Black districts in the DeSoto County area that mirrors my earlier functional analysis of the plan passed by the Mississippi State Legislature (the "2025 Legislative Plan"), as well as plans put forward by the Plaintiffs.

Functional Analysis of the SBEC Senate Plan

As in my March 14, 2025 Expert Report (ECF No. 243-10) and my March 26, 2025 Responsive Expert Report (ECF No. 252-1), both of which I incorporate here by reference, I used two statistical measures to carry out a functional analysis of the two majority Black state senate districts in the DeSoto County area of interest in the SBEC Senate Plan. The first measure, which I refer to as an **Effectiveness Score**, is simply the average vote share, expressed as a proportion, received by the 17 Black-preferred Black candidates that have competed statewide since 2015.[1] This score allows me to determine how Black-preferred Black candidates are likely to fare in proposed districts. A score of less than .5 means that the average vote share received by the Black-preferred Black candidates is less than 50% and the district is not likely to provide Black voters with an opportunity to elect their candidates of choice.

The second measure I relied on in my functional analysis, the **Percent Won Score**, is simply the number of contests the Black-preferred Black candidates won divided by the total number of election contests (17) included in the recompiled election returns. This is another way to assess the opportunity of Black voters to elect their candidates of choice. It is useful here because some of the contests incorporated in the recompiled results included more than two candidates and only a plurality of the vote was necessary to win these election contests.

[1] The Effectiveness and Percent Won scores are calculated on the basis of recompiled election results for the following 17 contests: the November 2024 contests for U.S. president and U.S. senate; the November 2023 contests for secretary of state, state treasurer, state auditor, commissioner of insurance, and commissioner of agriculture; the November 2020 election for US. senate; the November 2019 contests for secretary of state, attorney general, state treasurer, and commissioner of insurance; the 2018 special elections (general and general runoff) for U.S. senate; and the November 2015 elections for governor, secretary of state, and commissioner of agriculture.

My functional analysis is more comprehensive than Dr. Alford's because I incorporate three sets of state election cycles (2015, 2019, and 2023) rather than only two (2019 and 2023) in the scores. Moreover, I focus on contests with Black-preferred Black candidates, rather than all contests including those with only White candidates competing, because it is generally harder for Black-preferred Black candidates to garner White support than for Black-preferred White candidates to do so. (Dr. Alford does report separate performance scores for all contests between 2019 and 2024 and for those contests with Black-preferred Black candidates between 2019 and 2024 in his most recent report dated April 21, 2025.)

Table 1, below, provides the Effectiveness and Percent Won Scores for the five senate districts in the DeSoto County area of interest, including the two majority Black districts as configured in the SBEC Senate Plan. The percent Black voting age population (BVAP) of the districts is also included in the table. For comparison purposes, I have also included tables containing the same information for the 2025 Legislative Plan (Table 2), as well Plaintiffs' Senate Plan A (Table 3) and Plaintiffs' Senate Plan B (Table 4).

Table 1: Functional Analysis of DeSoto County Area Districts in SBEC Senate Plan

SBEC Senate Plan

District	Percent Black	Effectiveness Score	Percent Won Score
1	14.9%	.226	0.0%
2	50.1%	.486	58.8%
10	33.5%	.395	5.9%
11	53.5%	.555	94.1%
19	27.5%	.355	0.0%

Table 2: Functional Analysis of DeSoto County Districts in 2025 Legislative Plan

2025 Legislative Senate Plan

District	Percent Black	Effectiveness Score	Percent Won Score
1	52.5%	.488	42.1%
2	25.0%	.341	0.0%
10	29.3%	.372	5.9%
11	50.9%	.509	64.7%
19	24.0%	.297	0.0%

Table 3: Functional Analysis of DeSoto County Districts in Senate Plan A

Plaintiffs' Senate Plan A

District	Percent Black	Effectiveness Score	Percent Won Score
1	57.2%	.531	88.2%
2	15.9%	.247	0.0%
10	29.4%	.377	5.9%
11	50.1%	.517	82.4%
19	29.2%	.347	0.0%

Table 4: Functional Analysis of DeSoto County Districts in Senate Plan B

Plaintiffs' Senate Plan B

District	Percent Black	Effectiveness Score	Percent Won Score
1	57.1%	.517	76.5%
2	15.7%	.254	0.0%
10	28.6%	.363	0.0%
11	50.1%	.517	82.4%
19	31.3%	.381	0.0%

The Effectiveness Score in SBEC Remedial District 11 is .555 and the Percent Won score is 94.1%. This district is likely to provide Black voters with a realistic opportunity to elect their candidates of choice to the state senate.

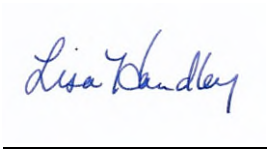
The Effectiveness Score for SBEC Remedial Senate District 2, however, is less than .5 – it is only .486. The Effectiveness Score for this district is not an improvement over the score of District 1 in the 2025 Legislative remedial plan; in fact, the score is slightly lower (.486 compared to .488).[2] The Percent Won Score of SBEC Remedial District 2 is 58.8%. This is an

[2] The Appendix provides Effectiveness and Percent Won Scores for the five districts in the DeSoto County area of interest in the SBEC Senate Plan for the various combinations of elections examined in the appendix of my March 26, 2025 Report, for comparison purposes. As is evident, SBEC Senate Plan District 2 fails to achieve an Effectiveness Score of .5 or above in a number of the election combinations.

increase from 42.1% in District 1 of the 2025 Legislative Plan, but it is not nearly as high as the Percent Won Score for District 1 in either Senate Plan A or Senate Plan B, both of which do provide Black voters with an additional, realistic opportunity to elect candidates of choice in the area of interest.

Based on this functional analysis, including a comparison of the SBEC Senate Plan with Plaintiffs' two proposed alternatives, it is clear that it is possible to fashion a remedy that would provide Black voters in the DeSoto County area with a better opportunity to elect their candidates of choice to the state senate than the SBEC Plan offers – one that at least produces an Effectiveness Score greater than .5.

I reserve the right to amend or supplement my report considering additional facts, testimony and/or materials that may come to light. Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct according to the best of my knowledge, information, and beliefs.



Dr. Lisa Handley

April 26, 2025

		District 1		District 2		District 10		District 11		District 19	
Election Years	**Candidates**	**Effectiveness Score**	**Percent Won**	**Effectiveness Score**	**Percent Won**	**Effectiveness Score**	**Percent Won**	**Effectiveness Score**	**Percent Won**	**Effectiveness Score**	**Percent Won**
2015-2024	Biracial only (Handley approach)	0.226	0.0%	0.486	58.8%	0.395	5.9%	0.555	94.1%	0.355	0.0%
2015-2024	Biracial and White-versus-White	0.231	0.0%	0.480	51.7%	0.404	6.9%	0.557	93.1%	0.348	0.0%
2015, 2019, 2023	Biracial only	0.217	0.0%	0.465	41.7%	0.391	0.0%	0.543	91.7%	0.337	0.0%
2015, 2019, 2023	Biracial and White-versus-White	0.228	0.0%	0.465	42.9%	0.404	4.8%	0.551	90.5%	0.337	0.0%
2018-2024	Biracial only	0.237	0.0%	0.518	71.4%	0.396	7.1%	0.570	100.0%	0.388	0.0%
2018-2024	Biracial and White-versus-White	0.240	0.0%	0.516	68.2%	0.399	4.5%	0.570	100.0%	0.386	0.0%
2019, 2023	Biracial only	0.230	0.0%	0.508	55.6%	0.392	0.0%	0.563	100.0%	0.381	0.0%
2019, 2023	Biracial and White-versus-White	0.239	0.0%	0.510	60.0%	0.398	0.0%	0.568	100.0%	0.384	0.0%
2019-2024	Biracial only	0.233	0.0%	0.516	66.7%	0.388	0.0%	0.565	100.0%	0.390	0.0%
2019-2024	Biracial and White-versus-White (new Allford approach)	0.240	0.0%	0.517	68.4%	0.395	0.0%	0.569	100.0%	0.389	0.0%